

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOWN OF OYSTER BAY, and
TOWN SUPERVISOR JOHN VENDITTO,
in his official capacity,

Defendants.

Case No.: 14-CV-02317 (ADS)(SIL)

ECF CASE

STIPULATED PROTECTIVE ORDER

By stipulation and agreement of the parties, and for good cause shown, it is hereby ORDERED that the following provisions shall govern the conduct of discovery in the above-referenced case.

1. In the course of this litigation, the parties acknowledge that they may seek in discovery documents or information that contains or reveals personal identifying information of third parties whose identities and related personal identifying information.
2. Either party in response to a discovery request, or any third party in response to a subpoena, may designate documents that contain such confidential information by affixing the legend "CONFIDENTIAL" to each page upon production. Within forty-five (45) days following the entry of this Stipulated Protective Order, either party may designate documents produced prior to the entry of this Order which contain such confidential information as "CONFIDENTIAL."
3. Any and all documents stamped "CONFIDENTIAL" shall be used only in

connection with this litigation and shall not be given, shown, made available, or otherwise disclosed to any person except for the parties; their counsel of record; experts or consultants who have been retained by a party and who have agreed to be bound by the terms of this order or who have otherwise agreed not to disclose documents and information stamped "CONFIDENTIAL" to any other third parties; litigation vendors, court reporters, and other litigation support personnel; and deponents in this action or any witness giving testimony, except that such deponents or witnesses shall not be permitted to retain a copy of any document stamped "CONFIDENTIAL."

4. Any and all documents stamped "CONFIDENTIAL" submitted to the Court or
I provided that permission to file under seal has been obtained from the Court. used at trial shall be filed under seal, or filed with the names and personal identifying

information of the third parties described in Paragraph 1, above, redacted. *Instructions on filing sealed documents can be found on the Court's website, www.nysd.uscourts.gov.*

5. Should any dispute arise as to the validity or appropriateness of a "CONFIDENTIAL" designation, the parties shall endeavor in good faith to resolve or narrow their dispute prior to seeking the intervention of the Court.

6. This protective order shall survive and remain in full force and effect after termination of this action, and the Court shall retain jurisdiction for the purpose of its enforcement.

SO STIPULATED AND AGREED:

Date: June 18, 2015

/s/ Brett Reynolds
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Brett Reynolds
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Attorneys for the Plaintiff

SO ORDERED THIS _____
DAY OF _____, 2015:
A

Hon. Arthur D. Spatt
United States District Judge

SO ORDERED

by

Magistrate Judge Steven I. Locke

/s/ Steven I. Locke